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A D M I T T E D N Y

January 12, 2024

By ECF

The Honorable Lewis J. Liman United States District Court Southern District of New York 500 Pearl Street, Room 15C New York, New York 10007

REQUEST GRANTED.

The Evidentiary Hearing previously set for January 24, 2024 is RESCHEDULED to April 29, 2024 at 10:30AM in Courtroom 15C at the 500 Pearl Street Courthouse.

1/16/2024 so ordered.

Re: United States v. Siegel, 23 Cr. 207 (LJL)

LEWS J. LIMAN United States District Judge

Your Honor:

Gilbert Bayonne and I represent defendant Danielle Siegel in the above-referenced case. With the government's consent, we request an adjournment of the evidentiary hearing set for January 24, 2024, at 10:30 a.m. for the following reasons.

First, as lead counsel, I am not available on January 24, 2024, because I will be defending a homicide trial in the Eastern District of New York, entitled *United States v. Jordan, et al.*, 20 Cr. 305 (LHD), which is estimated to end in late February 2024. Thereafter, I have another homicide trial in the Southern District of New York entitled *United States v. Terrell, et al.*, 22 Cr. 343 (JMF), beginning on March 11, 2024, which is scheduled to end in mid-April 2024.

Secondly, the defense has submitted a request for disposition to the government, and thus, an adjournment of the evidentiary hearing would provide both parties with sufficient time for meaningful plea discussions.

Accordingly, the defense requests that the evidentiary hearing be adjourned to late April 2024 or before May 6, 2024, which is the deadline for filing the parties' *motions in limine*. On April 22 through 24, 2024, I will be out of state. On April 25, 2024, I have a sentencing hearing in the Eastern District of New York at 3:00 p.m. On April 30, 2024, I have a pretrial conference in the Eastern District of New York at 11:00 a.m.

We appreciate the Court's consideration of this application.

Respectfully,

/s/ Michael Hueston

Cc: Counsel of Record